

CONFIDENTIAL

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

MICHAEL J. DANIELS, et al.,

Plaintiffs,

vs

No. SA-19-CA-01280-FB

AETC II PRIVATIZED HOUSING,  
LLC, et al.,  
Defendants.

CONFIDENTIAL

DEPOSITION OF KASSANDRA WOLF  
DAY 1 OF 2

Taken on Behalf of the Defendants  
On August 23, 2021, beginning at 8:58 a.m.  
In Tulsa, Oklahoma

APPEARANCES

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REPORTED BY: MARY K. BECKHAM, CSR, RPR

**EXHIBIT**

**1**

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<p style="text-align: right;">Page 54</p> <p>1 lawyer.</p> <p>2 Q Were you still on Randolph when you had</p> <p>3 the discussions about legal things and the lawyer</p> <p>4 with the Hiatts?</p> <p>5 A Yes.</p> <p>6 Q Megan and Lance Konzen?</p> <p>7 A I know them. I did not direct them.</p> <p>8 Q How do you know them?</p> <p>9 A Through Facebook.</p> <p>10 Q Shane and Becky Vinales?</p> <p>11 A I know them. I did not direct them.</p> <p>12 Q Did they have a lawyer prior to you?</p> <p>13 A I believe they were looking into speaking</p> <p>14 with Ryan as well. I don't know how.</p> <p>15 Q And then we have Thompson, Amanda Thompson</p> <p>16 is the service member?</p> <p>17 A I don't know that name off the top of my</p> <p>18 head.</p> <p>19 Q Michael and Elldwinia English?</p> <p>20 A I don't know that name off the top of my</p> <p>21 head.</p> <p>22 Q Kari Hill?</p> <p>23 A I do know the name, and I've seen her a</p> <p>24 few times.</p> <p>25 Q Did you have any discussions with her</p>	<p style="text-align: right;">Page 56</p> <p>1 interactions with either Skillingstad or Castillo</p> <p>2 family?</p> <p>3 A Not that I know of, not that I can</p> <p>4 remember.</p> <p>5 Q Furman? He's a marine major, Furman?</p> <p>6 A No, ma'am. Sorry, I shook my head. No,</p> <p>7 ma'am.</p> <p>8 Q I might have one more for you in a minute,</p> <p>9 but that's all that's coming to my head. When you</p> <p>10 provide the information about your attorneys to</p> <p>11 people who contact you, is that via social media</p> <p>12 means or text message or in person?</p> <p>13 A I'm not sure. I'm not sure how I shared</p> <p>14 the info with them.</p> <p>15 Q I've got one of the families, I just</p> <p>16 realized, Carmen and Mary Elizabeth Pisano?</p> <p>17 A I don't know them. I know their name.</p> <p>18 Q And you know the Hamiltons?</p> <p>19 A Yes.</p> <p>20 Q And did you have a lawyer before</p> <p>21 Ms. Hamilton, or did she have a lawyer before you?</p> <p>22 A I'm not sure.</p> <p>23 Q Do you remember if you provided any</p> <p>24 information to Ms. Hamilton or vice versa?</p> <p>25 A I'm not sure.</p>
<p style="text-align: right;">Page 55</p> <p>1 about your attorneys or a lawsuit?</p> <p>2 A Yes.</p> <p>3 Q And when was that?</p> <p>4 A I don't remember exact dates.</p> <p>5 Q Did you provide her with your attorneys'</p> <p>6 information?</p> <p>7 A I did.</p> <p>8 Q And do you remember where you all were</p> <p>9 when you provided -- or if it was online or</p> <p>10 whatever, with the attorneys' information?</p> <p>11 A I'm not sure.</p> <p>12 Q Before you provided the attorney</p> <p>13 information, had you had -- were you friends with</p> <p>14 Ms. Hill?</p> <p>15 A No.</p> <p>16 Q How would the two of y'all's paths cross?</p> <p>17 A I heard her speak at one of the housing</p> <p>18 events, one of the town halls, I believe, and ran</p> <p>19 out -- or ran into her out in public. I can't</p> <p>20 remember where.</p> <p>21 Q Skillingstad?</p> <p>22 A I don't know them. I've heard the name.</p> <p>23 Q Castillo?</p> <p>24 A I don't know them.</p> <p>25 Q Never had any conversations or</p>	<p style="text-align: right;">Page 57</p> <p>1 Q It appears that you and Ms. Hamilton were</p> <p>2 pretty close?</p> <p>3 A Yes.</p> <p>4 Q Okay. Had you been close with</p> <p>5 Ms. Hamilton since she moved on Randolph, or when</p> <p>6 did your friendship develop?</p> <p>7 A I don't remember when our friendship</p> <p>8 developed.</p> <p>9 Q Are any of your children friends with each</p> <p>10 other?</p> <p>11 A Whose children?</p> <p>12 Q Y'all's, Ms. Hamilton and yours.</p> <p>13 A We have played -- well, I had not played.</p> <p>14 My son had played with her son. My son, Matthew,</p> <p>15 had played with her son once or twice. They didn't</p> <p>16 really become friends, I guess, didn't really have a</p> <p>17 chance.</p> <p>18 Q Would you say that your friendship</p> <p>19 developed through, like, housing?</p> <p>20 A I'm not sure when our friendship started.</p> <p>21 We had talked prior off and on, so I'm not sure at</p> <p>22 what point we would consider ourselves friends.</p> <p>23 Q Okay. Prior to moving to Randolph, and I</p> <p>24 am talking about the specific unit on Randolph, had</p> <p>25 you ever had or experienced any mold in any prior</p>

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<p style="text-align: right;">Page 58</p> <p>1 residences?</p> <p>2 A Not that I'm aware of. I know we had some</p> <p>3 type of damage in our Schertz home, but I'm not sure</p> <p>4 what the outcome, like what that was claimed the</p> <p>5 damage was.</p> <p>6 Q Tell me what the damage was in the Schertz</p> <p>7 home.</p> <p>8 A It just looked like the wall was messed</p> <p>9 up, and I made the landlord deal with it. I said I</p> <p>10 thought that it was mold, and I never got</p> <p>11 confirmation.</p> <p>12 Q And what is it that was -- I'm just</p> <p>13 looking for a little more description of when you</p> <p>14 say the wall was messed up and he dealt with it?</p> <p>15 A He had a bunch of contractors come in and</p> <p>16 take the wall out, and we weren't in the home. We</p> <p>17 were in a hotel, so I'm not sure what they called</p> <p>18 the damages.</p> <p>19 Q And how long were you all out of the home</p> <p>20 and at a hotel?</p> <p>21 A I'm not sure exact time frames on that.</p> <p>22 Q Okay. Was it less than a week, more than</p> <p>23 a week?</p> <p>24 A I don't really remember.</p> <p>25 Q And when you all were in a hotel, did they</p>	<p style="text-align: right;">Page 60</p> <p>1 sheets, and some of the furniture was just too big</p> <p>2 to go in Randolph. It was a lot smaller than our</p> <p>3 home.</p> <p>4 Q Did you ever take any photos of what you</p> <p>5 believed to be mold in your Schertz -- was it an</p> <p>6 apartment or home?</p> <p>7 A It was a home.</p> <p>8 Q Schertz home?</p> <p>9 A I don't remember. I believe I did and</p> <p>10 sent it to the landlord. I don't know that I have</p> <p>11 that now.</p> <p>12 Q Have you, since this lawsuit began, looked</p> <p>13 to see if you have those photos?</p> <p>14 A Those specific photos?</p> <p>15 Q Yes.</p> <p>16 A From living in Schertz?</p> <p>17 Q Yes, ma'am.</p> <p>18 A No.</p> <p>19 Q We would ask that you do that, and I would</p> <p>20 make a request that those be provided to us if they</p> <p>21 exist.</p> <p>22 A Okay.</p> <p>23 MS. NEAL: I don't know that that actually</p> <p>24 fits within any of your RFP, so if you want to</p> <p>25 supplement your request, that's fine.</p>
<p style="text-align: right;">Page 59</p> <p>1 provide any kind of compensation for meals or</p> <p>2 anything like that?</p> <p>3 A Yes.</p> <p>4 Q How much was that?</p> <p>5 A I don't remember.</p> <p>6 Q Any testing in your Schertz home?</p> <p>7 A I'm not sure.</p> <p>8 Q Are you aware of any?</p> <p>9 A Not that I am aware of.</p> <p>10 Q Did y'all move back in?</p> <p>11 A I don't remember the time frame of when we</p> <p>12 were out before living on Randolph, so I don't</p> <p>13 remember if we transitioned directly from the house</p> <p>14 off base to the Randolph home or what the gap was.</p> <p>15 Q Did you take all of your possessions that</p> <p>16 were in the Schertz home to the Randolph home?</p> <p>17 A Not all. We threw some away when we move</p> <p>18 and downsize.</p> <p>19 Q Do you remember what you threw away?</p> <p>20 A Some furniture, some bedding or clothing,</p> <p>21 like old sheets and things.</p> <p>22 Q And the reason you all threw them away</p> <p>23 is --</p> <p>24 A My children have sensory issues, and we</p> <p>25 switched their sheets so they could have softer</p>	<p style="text-align: right;">Page 61</p> <p>1 MS. SKIPPER: Okay. Okay. Understood. I</p> <p>2 think there is one, but I will take that comment.</p> <p>3 Q (By Ms. Skipper) Any other prior</p> <p>4 residence prior to living on base at Randolph that</p> <p>5 you believe there was mold in any of the residences?</p> <p>6 A I know we had a major water leak at</p> <p>7 Tinker, and under the carpet was dirty. I don't</p> <p>8 know what that was.</p> <p>9 Q Okay. And what kind of water leak was it?</p> <p>10 A I believe it was from the air</p> <p>11 conditioning.</p> <p>12 Q And how much of the carpet -- you said the</p> <p>13 carpet was dirty?</p> <p>14 A Under the carpet.</p> <p>15 Q Okay. Tell me what that means.</p> <p>16 A Where the leak was, they had lifted the</p> <p>17 carpet, and it was dirty and wet, and I don't know</p> <p>18 what it was.</p> <p>19 Q Did you ever write or complain to housing</p> <p>20 during your time at Tinker?</p> <p>21 A I don't remember if I did.</p> <p>22 Q Did housing replace the carpet?</p> <p>23 A They did not.</p> <p>24 Q What did they do about the wet or dirty</p> <p>25 carpet?</p>

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<p style="text-align: right;">Page 254</p> <p>1 Q Okay.</p> <p>2 A I don't believe there were outside people.</p> <p>3 None that I can remember right now.</p> <p>4 Q Okay. Before you moved into Randolph, had</p> <p>5 you seen any advertising for Randolph Family</p> <p>6 Housing?</p> <p>7 A No.</p> <p>8 Q When you moved into the unit, did you</p> <p>9 believe that it could be lived in? Did you have any</p> <p>10 health or safety concerns when you first moved in?</p> <p>11 A I believe it could be lived in. I have</p> <p>12 opinions on it, but I feel based on what we walked</p> <p>13 into that it could be livable, yes.</p> <p>14 Q You wouldn't have moved your family into</p> <p>15 something -- your children into something you didn't</p> <p>16 believe could be lived in, that was a health and</p> <p>17 safety hazard, right?</p> <p>18 A Not knowingly, no.</p> <p>19 Q At any point did you believe that the</p> <p>20 house became uninhabitable?</p> <p>21 A Yes.</p> <p>22 Q When was that?</p> <p>23 A When they pulled the mold out in front of</p> <p>24 my face and told me it was dirt.</p> <p>25 Q Did you ever have your Tinker Air Force</p>	<p style="text-align: right;">Page 256</p> <p>1 have any health problems that you relate to your</p> <p>2 home at Tinker?</p> <p>3 A I'm not entirely sure of what I would say</p> <p>4 relates to Tinker specifically. I did have some</p> <p>5 health things. I don't know that any of those are</p> <p>6 pinpointed on Tinker.</p> <p>7 Q How did you make the decision to link</p> <p>8 something with regard to the house at Randolph to</p> <p>9 any health issues versus not linking any health</p> <p>10 issues to Tinker?</p> <p>11 MS. NEAL: Objection to form.</p> <p>12 A Given what we knew by the testing that we</p> <p>13 had done in the Randolph home and one of my son's</p> <p>14 allergens clearly popping up on the test that was</p> <p>15 done, that's why I relate that issue to Randolph.</p> <p>16 Q (By Ms. Skipper) Did your husband have</p> <p>17 any health issues that were related to the Tinker</p> <p>18 home?</p> <p>19 A Not that I'm aware of.</p> <p>20 Q Any of your other children other than</p> <p>21 Gabriel?</p> <p>22 A Not that I'm aware of.</p> <p>23 Q Did you talk with any doctor or medical</p> <p>24 professional about what you believed to have been</p> <p>25 mold in your Tinker home?</p>
<p style="text-align: right;">Page 255</p> <p>1 Base home tested for mold?</p> <p>2 A No. Not that I remember, sorry.</p> <p>3 Q You have a Facebook post related to your</p> <p>4 Tinker home that said that it had flooded multiple</p> <p>5 times, and you related your child going to the</p> <p>6 hospital --</p> <p>7 A Yes.</p> <p>8 Q -- to the condition of the home at Tinker?</p> <p>9 A Yes.</p> <p>10 Q Which child was that?</p> <p>11 A Gabriel.</p> <p>12 Q What health problem did you associate that</p> <p>13 child having from the Tinker home?</p> <p>14 A He had -- he had childhood asthma. I</p> <p>15 don't know his current situation on it. He lives</p> <p>16 with his father, but at that time he had childhood</p> <p>17 asthma and environmental allergens. One of his top</p> <p>18 allergies is Penicillium.</p> <p>19 Q Okay. So you believe that there was</p> <p>20 Penicillium in the Tinker home?</p> <p>21 A I'm not entirely sure. I just know that</p> <p>22 based on his breathing and that water damage, I</p> <p>23 believe that what we had at that home could have</p> <p>24 been mold. I don't know.</p> <p>25 Q Do you have any health problems or did you</p>	<p style="text-align: right;">Page 257</p> <p>1 A I can't recall.</p> <p>2 Q Did you go to Command about anything with</p> <p>3 regard to the Tinker home?</p> <p>4 A I can't recall if we did or not.</p> <p>5 Q When the house flooded at Tinker those</p> <p>6 multiple times, did they move you out, or did you</p> <p>7 stay?</p> <p>8 A They did not move us out. They dried the</p> <p>9 carpet with fans.</p> <p>10 (Exhibit 192 marked for identification.)</p> <p>11 Q (By Ms. Skipper) I'm going to show you</p> <p>12 what we'll mark as the next exhibit as 192, and if</p> <p>13 you'll just confirm that that is your post that you</p> <p>14 made on Facebook with regard to your Tinker home.</p> <p>15 A Now that I've read it, what was the</p> <p>16 question again? I apologize.</p> <p>17 Q This is the post and your commentary, and</p> <p>18 the photo underneath it relates to the Tinker --</p> <p>19 A Yes, ma'am.</p> <p>20 Q -- housing. In that first -- I'm sorry,</p> <p>21 the second paragraph it says -- it relates to the</p> <p>22 carpet, and it says, "Guess what that was, mold,</p> <p>23 mold all under that carpet, the same mold that my</p> <p>24 son is highly allergic to, the same mold that sent</p> <p>25 him in an ambulance without me, because I had the</p>

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<p style="text-align: right;">Page 258</p> <p>1 other kids with me at the same time and they 2 wouldn't let me in." Was there testing in your 3 Tinker home? 4 A This is written when I was highly 5 emotional, and I did not have testing. This is my 6 gut feeling as an emotional mother trying to protect 7 her child. 8 Q Okay. And this September 19th was eight 9 years after the original event? 10 A I'm not sure if it was eight years from 11 the original event or eight years from the time I 12 posted whatever this event was. 13 Q That's a good clarification. Thank you 14 for that. 15 A So I would have to look at that original 16 notification to tell you a yes or no on that. 17 Q Okay. So you posted this September 19th, 18 2020? 19 A Yes, I believe so. That should have been 20 a 2020. 21 Q Okay. And you were emotional about what 22 had happened at Tinker, because the post popped up 23 in your memories? 24 A Yes. 25 Q And what hospital is it that Gabriel went</p>	<p style="text-align: right;">Page 260</p> <p>1 (A recess was had from 4:11 to 4:23.) 2 Q (By Ms. Skipper) I want to talk about -- 3 I know we're going to switch gears a little bit just 4 so we can hopefully finish it and not leave a 5 subject kind of in the middle before we break for 6 the day. Your damages that you are being claimed -- 7 that are being claimed in this lawsuit are medical, 8 household goods, BAH, items that were purchased. 9 Anything else? 10 A The money back for the RECP program, the 11 utility money that we had spent to live there. 12 Q Okay. Let's start there first. The 13 utility money, do we have all of the bills related 14 to any overages you had? 15 A You should. I'm not sure how that works. 16 Maybe somebody could reach out and get them. I 17 don't have a copy of all the bills. 18 Q Okay. What is it that you have -- do you 19 have a number that you believe relates to the 20 overages in utilities? 21 A I don't have -- 22 MS. NEAL: Objection, form. 23 A -- an exact number. 24 Q (By Ms. Skipper) Do you have the history 25 of your utility payments while at Randolph that we</p>
<p style="text-align: right;">Page 259</p> <p>1 to without you? 2 A I can't recall which one they took him to. 3 Q Okay. 4 A It would be here in Oklahoma. I just 5 don't know which one. 6 Q Does Tinker have an ER hospital? 7 A They do not. They did have a clinic. It 8 has since been torn down, so it would have been an 9 off-base provider for that one. 10 Q And in your KENS 5 story, there's a 11 picture of a little boy. It looks like it's in a 12 hospital bed with some breathing apparatus. Who was 13 the little boy in the bed? 14 A I don't know which picture you are 15 referring to, so I can't answer, since I have three 16 sons. 17 Q Okay. It's the only one that appeared -- 18 the only son that appeared in the KENS 5 story. 19 A I'm not sure which one they put in, 20 whether it was one or the other. 21 Q Okay. Well, we'll watch it -- 22 A Okay. 23 Q -- and I'll ask those questions again. 24 MS. NEAL: Do you want to take a break? 25 MS. SKIPPER: Yeah, we can.</p>	<p style="text-align: right;">Page 261</p> <p>1 could look at and see? 2 A I don't think that I personally have 3 those, no. I think that that's something we would 4 have to reach out to Minol about. 5 Q Do you have any out-of-pocket medical 6 expenses for yourself or any of your family members 7 related to this case? 8 A Just any medicine that I either wasn't 9 able to get on base or just was too inconvenient to 10 drive on base. It couldn't have been more than a 11 few dollars at most. So whatever the Tricare 12 portion is above what we would have spent on base. 13 nothing significant, I guess. 14 Q Do you have -- I know we talked about an 15 inventory of the things that you left behind. Have 16 you placed a monetary value on each of those items? 17 A At this time not on each of the items, no. 18 Q Do you have a total? 19 A I do not have a complete total, no. 20 Q What damages to household goods that 21 require further remediation or replacement, what is 22 that speaking to? 23 A I'm sorry, I didn't understand. 24 Q So I asked basically for an itemization of 25 damages and a dollar amount, and the response was</p>

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1 CERTIFICATE

2

3 I, Mary K. Beckham, Certified Shorthand

4 Reporter, do hereby certify that the above-named KASSANDRA  
5 WOLF was by me first duly sworn to testify the truth, the  
6 whole truth, and nothing but the truth, in the case

7 aforesaid; that the above and foregoing deposition

8 was by me taken in shorthand and thereafter  
9 transcribed; that the same was taken, pursuant to  
10 stipulations hereinbefore set out; and that I am not  
11 an attorney for nor relative of any of said parties  
12 or otherwise interested in the event of said action.

13

14 IN WITNESS WHEREOF, I have hereunto set my  
15 hand and official seal this 31st day of August,  
16 2021.

17

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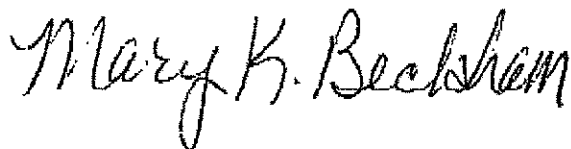
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Mary K. Beckham, CSR, RPR

CSR No. 01053

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

MICHAEL J. DANIELS, et al.,

Plaintiffs,

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No. SA-19-CA-01280-FB

AETC II PRIVATIZED HOUSING,  
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Defendants.

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DEPOSITION OF KASSANDRA WOLF

DAY 2 OF 2

Taken on Behalf of the Defendants  
On August 25, 2021, beginning at 8:38 a.m.  
In Tulsa, Oklahoma

APPEARANCES

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Job No. CS4750228

REPORTED BY: MARY K. BECKHAM, CSR, RPR



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<p style="text-align: right;">Page 369</p> <p>1 from the doctor. You were provided a handout on</p> <p>2 lower back pain, and you were to start doing daily</p> <p>3 rehabilitative exercises. Does this help refresh</p> <p>4 your recollection of a diagnosis of lower back pain</p> <p>5 in 2010?</p> <p>6 A Not specifically. I see that it is. Just</p> <p>7 not specifically, no.</p> <p>8 (Exhibit 210 marked for identification.)</p> <p>9 Q (By Ms. Skipper) Okay. There were</p> <p>10 references to you having foot pain for years, which</p> <p>11 caused swelling and radiating pain from your right</p> <p>12 hip, and you were diagnosed with sciatica in your</p> <p>13 right lower extremity. Do you remember that?</p> <p>14 A I don't remember the exact diagnosis or</p> <p>15 when it happened. I remember talking about that</p> <p>16 with doctors, yes.</p> <p>17 Q Okay. And do you still suffer from</p> <p>18 sciatica pain?</p> <p>19 A Here and there, not as much anymore.</p> <p>20 Q I have some more questions. I'm trying to</p> <p>21 get all the medical done first. Have we talked</p> <p>22 about all of the medical symptoms, claims that you</p> <p>23 are going to make that you believe are related to</p> <p>24 living at Randolph?</p> <p>25 MS. NEAL: Objection, form.</p>	<p style="text-align: right;">Page 371</p> <p>1 allergy, I'm not sure. It just -- he just felt like</p> <p>2 junk a lot in the house.</p> <p>3 Q Okay.</p> <p>4 A The only other thing for him would be just</p> <p>5 the bug bites and things that he got there.</p> <p>6 Q I did go back and look at your statement</p> <p>7 from the town hall, and you said that CPS got</p> <p>8 involved with the bug bites?</p> <p>9 A I'm not sure if it was CPS. I know it was</p> <p>10 that advocacy or group or whatever we discussed</p> <p>11 yesterday, and I don't know the name of who that</p> <p>12 was, but it was child-type protection or, like, a</p> <p>13 family advocacy type group.</p> <p>14 Q Okay.</p> <p>15 A I don't know their name.</p> <p>16 Q Okay. So, yes, because we have tried to</p> <p>17 get the family advocacy records. They require a</p> <p>18 specific authorization.</p> <p>19 MS. SKIPPER: I'm going to hand you this,</p> <p>20 Jenn, and you can obviously discuss with Ms. Wolf,</p> <p>21 you know, the issues on signing it. But we have not</p> <p>22 been able to get the family advocacy records that</p> <p>23 relate to Gabe and the bug bites or anything else</p> <p>24 that they may have been involved with your family,</p> <p>25 without a specific authorization giving them to us.</p>
<p style="text-align: right;">Page 370</p> <p>1 A I'm not sure, but we've been over a lot</p> <p>2 that I feel is pretty sufficient. I don't think</p> <p>3 there's anything above and beyond that.</p> <p>4 Q (By Ms. Skipper) Okay. Let's talk about</p> <p>5 your children next. I have Gabriel Winchell. What,</p> <p>6 if anything, are you going to claim in terms of</p> <p>7 medical that relates -- that you believe relates to</p> <p>8 him living in the Randolph unit?</p> <p>9 MS. NEAL: Objection, form.</p> <p>10 A Is there a different way you can ask it?</p> <p>11 It didn't really hit for me.</p> <p>12 Q (By Ms. Skipper) Okay. What is it that</p> <p>13 you believe Gabriel suffered from, had symptoms of,</p> <p>14 that you believe relates to exposure to mold or any</p> <p>15 of the issues you believe were in your Randolph</p> <p>16 house?</p> <p>17 MS. NEAL: Objection, form.</p> <p>18 A For him, I knew that he already had</p> <p>19 asthma, like childhood asthma. I feel like his</p> <p>20 symptoms were worse in the home. It's something we</p> <p>21 discussed with doctors more than one time. He had</p> <p>22 medicines that he would take. He had times of</p> <p>23 labored breathing. He had times of just constant,</p> <p>24 like, almost like a sinus infection, like a just</p> <p>25 runny nose and cough and sneezing, general or house</p>	<p style="text-align: right;">Page 372</p> <p>1 MS. NEAL: We'll look at it and let you</p> <p>2 know.</p> <p>3 MS. SKIPPER: Thank you.</p> <p>4 Q (By Ms. Skipper) So I have his symptoms</p> <p>5 of asthma were worse, you said medicine. Are you</p> <p>6 saying he took more medicine?</p> <p>7 A He wasn't taking as many of his allergy</p> <p>8 medicines or anything when we were off base. He</p> <p>9 went back to taking, like, the daily OTC type stuff</p> <p>10 when we got on base, just had that general ick.</p> <p>11 Q Did you ever see a doctor or medical</p> <p>12 professional that related anything about the home to</p> <p>13 any of the medical symptoms for Gabriel?</p> <p>14 MS. NEAL: Objection, form.</p> <p>15 A Nothing that I can think of specifically.</p> <p>16 I know it was an issue that was discussed with one</p> <p>17 or more doctors.</p> <p>18 Q (By Ms. Skipper) Okay. And how did you</p> <p>19 come to believe that his increased asthma symptoms</p> <p>20 related to the home?</p> <p>21 A Because he actually is allergic to</p> <p>22 Penicillium --</p> <p>23 Q Okay.</p> <p>24 A -- based on what his father discussed with</p> <p>25 me.</p>



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<p style="text-align: right;">Page 373</p> <p>1 Q Okay. So do you -- so it wasn't testing 2 with you that he has that allergy? 3 A No, ma'am. 4 Q Do you have records? 5 A I don't personally have records, no. 6 Q So there's -- where would I find those 7 records? 8 A I would love to tell you that answer. His 9 father and I have a very jaded past, and he kept me 10 out of the loop on pretty much everything he did 11 when he had my child, so that would be something 12 that I couldn't personally answer. I don't know how 13 to get the answer. 14 Q Does he know that his child is part of 15 this lawsuit? 16 A I don't know. 17 Q Have you told him? 18 A I don't know that we specifically have had 19 a conversation about this. 20 Q Okay. Well, I mean, there is -- I'm just 21 going to be very candid -- very little medical 22 information on certain ones of your children that 23 you didn't always have custody of, so how am I going 24 to figure out where they had medical -- that was 25 obviously one of the things we asked for on Exhibit</p>	<p style="text-align: right;">Page 375</p> <p>1 A Okay. 2 Q Okay. We'll cross that bridge. Tell me 3 what it means when you say the symptoms -- his 4 asthma symptoms got worse. 5 A We had to do nebulizers more often at 6 home, so that he could clear his airway. He had to 7 go into the hospital a couple of times to help get 8 his breathing back to where it should be, get his 9 oxygen and things back. He just had that general -- 10 I know that that's not really helpful, but it was 11 just that general ick, that general, like, runny 12 nose, coughing, sneezing, the post nasal kind of 13 feeling, and so if he would express that to me, I 14 would take him. It just depends on, you know, when 15 and what was going on. Just if he would bring it 16 up, we would go. 17 Q Does Gabe have asthma, exercise-induced 18 asthma? 19 A I think it was labeled childhood asthma in 20 the beginning. I don't know if or what that is 21 labeled now. 22 Q Okay. When was he first diagnosed with 23 asthma? 24 A I don't know if that was with me or with 25 his father, so I don't know the answer to that.</p>
<p style="text-align: right;">Page 374</p> <p>1 A to the deposition. How am I going to figure out 2 where they went to the doctor when they weren't in 3 your care, if you don't have those records? 4 A I don't know how to obtain that 5 information. I asked several times to get that type 6 of information, even during my custody case, and he 7 never presented anything for me. So I don't know 8 how to do that. 9 Q Can I contact your ex-husband? 10 A I'm not so much worried about contact for 11 getting information for this. It's what that 12 contact will start for me, given that relationship, 13 so -- can we maybe get an answer to you on that at 14 another time? 15 Q Yeah, I mean, that's fine. 16 A That has serious triggers for me, so if 17 there's a way I can do that that's less brash and in 18 his face, maybe he'll be calmer. I don't really 19 know. 20 Q Well, yes, I am at the point that I do 21 need that information, because that is -- that was 22 going to be one of my questions, because you've 23 given several interviews and spoke at town halls 24 about the severe allergy for him, and I have no 25 record of it.</p>	<p style="text-align: right;">Page 376</p> <p>1 Q What is the first known diagnosis of 2 asthma in Gabe that you were aware of? 3 A When we were at Keesler Air Force Base. I 4 know that we went in a couple of times when we were 5 there, so there should be something, at least at 6 that point. 7 Q And for his asthma presentation, is it 8 breathing, wheezing, coughing, does he turn blue? 9 What does an asthma attack look like for him? 10 A I don't remember him ever turning blue. I 11 know he had extremely labored breathing a couple of 12 times and that -- like the chest sink. 13 Q Concave chest? 14 A Yeah, yes. Just like the gasping, that 15 (noise) trying to catch his breath, and then just 16 the (noise) wheeze feel, the wheeze sound, yeah. 17 Q Prior to moving to Randolph, was he on any 18 kind of asthma regimen? 19 A He was off and on throughout his life, 20 depending on which parent he lived with or which 21 doctor we were seeing. There were times that they 22 had him on, like, Singulair and Zyrtec and Flonase 23 and things like that. It just varied when and how 24 much and where we were. 25 Q When y'all were living in Schertz, do you</p>

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<p style="text-align: right;">Page 385</p> <p>1 best not to have pets --</p> <p>2 A Not specifically.</p> <p>3 Q -- around Gabe? At this time in 2009 he</p> <p>4 was given an allergy test. Was this with you, or</p> <p>5 was this with his father?</p> <p>6 A I don't remember.</p> <p>7 Q Okay. Well, I'll tell you, it's the 81st</p> <p>8 Medical Group, which is at Keesler, so I'm assuming</p> <p>9 this was you. Did your father -- or his father ever</p> <p>10 come down to Keesler?</p> <p>11 A No.</p> <p>12 Q Okay. I'm going to show you his allergy</p> <p>13 testing.</p> <p>14 MS. SKIPPER: We'll mark the June 2009</p> <p>15 record as 211, and we'll mark the actual allergy</p> <p>16 testing as 212.</p> <p>17 (Exhibit 211 and 212 marked for</p> <p>18 identification.)</p> <p>19 Q (By Ms. Skipper) Just like we did with</p> <p>20 yours, we'll just go through it. So you'll see the</p> <p>21 first one is Alternaria Alternata, which is a mold,</p> <p>22 and it registered as a .36, which is, as you can</p> <p>23 tell by the interpretation below, one above absent,</p> <p>24 which means it's a low level. Then we have</p> <p>25 Aspergillus Fumigatus, which is -- which registered</p>	<p style="text-align: right;">Page 387</p> <p>1 Q So from the allergy screening, his most</p> <p>2 significant allergy is to cats --</p> <p>3 A Okay.</p> <p>4 Q -- is that correct?</p> <p>5 A Yes.</p> <p>6 Q Did you know that?</p> <p>7 A No.</p> <p>8 Q For the time that he lived at Randolph, he</p> <p>9 had a tabby cat in the house named Dupey?</p> <p>10 A Dupey.</p> <p>11 Q Dupey. Is that correct?</p> <p>12 A Yes.</p> <p>13 Q He also had a high level reaction to dog</p> <p>14 dander, and he also had a dog in the house when he</p> <p>15 lived at Randolph, correct?</p> <p>16 A Correct.</p> <p>17 Q There was a reference during the time</p> <p>18 period when housing was trying to get into the home</p> <p>19 to do the remediation that there were three dogs in</p> <p>20 the house. Were there three dogs in the home?</p> <p>21 A For a short time, yes.</p> <p>22 Q And when was that?</p> <p>23 A I can't remember exact dates. I know we</p> <p>24 were puppy sitting.</p> <p>25 Q What kind of dogs were those?</p>
<p style="text-align: right;">Page 386</p> <p>1 as a .44, which is a low level. Then we have Gray</p> <p>2 Alder being negative; Ash White being negative;</p> <p>3 Boxelder tree, negative; Burch, negative;</p> <p>4 Cladosporium Herbarum, .57, low level; cat dander is</p> <p>5 greater than a 100, which is a very high level;</p> <p>6 Cockroaches, negative; cottonwood, negative;</p> <p>7 Curvularia Lunata, negative; cypress Italian,</p> <p>8 negative. The next two are dust mites, negative;</p> <p>9 Dog Dander, 6.60, which is a high level; elder</p> <p>10 Marsh, negative; Elm, negative; Firebush, negative.</p> <p>11 Bahia Grass is .76, which is a moderate level;</p> <p>12 Bermuda Grass is 1.48, which is also a moderate</p> <p>13 level; Johnson Grass, .41 is a low level; Rye Grass</p> <p>14 was negative; Hackberry tree was negative; Hickory</p> <p>15 was negative; Juniper Mountain was negative; Lambs</p> <p>16 Quarter, negative; Mesquite Tree, negative; Mugwort</p> <p>17 was negative; Mulberry was negative; Nettle was</p> <p>18 negative; Oak was negative; Olive Tree was negative.</p> <p>19 Penicillium Chrysogenum was negative; Pine White,</p> <p>20 negative; Plantains, negative; Ragweed, negative;</p> <p>21 Sheep Sorrel, negative; Sycamore Maple, negative;</p> <p>22 Russian Thistle, negative; Timothy Grass, negative;</p> <p>23 Walnut Tree, negative; Cocklebur, negative. Did I</p> <p>24 read all those correctly?</p> <p>25 A I believe so.</p>	<p style="text-align: right;">Page 388</p> <p>1 A I don't know their type. They were</p> <p>2 medium-sized dogs.</p> <p>3 Q Who were you puppy sitting for?</p> <p>4 A A defense contractor, I think, was his</p> <p>5 job.</p> <p>6 Q What's his name?</p> <p>7 A David.</p> <p>8 Q Last name?</p> <p>9 A May I look at my phone to tell you?</p> <p>10 Q We can at a break.</p> <p>11 A Okay. I'll get back to you with the name</p> <p>12 then.</p> <p>13 Q Okay. So do you have any estimate if that</p> <p>14 was a day, a week, two months that you had these</p> <p>15 three dogs in the house?</p> <p>16 A A couple of weeks, I believe. Maybe a</p> <p>17 couple of months. I don't -- I don't remember the</p> <p>18 time frame while at Randolph, how long we had them.</p> <p>19 Q Did you know he had an allergy to certain</p> <p>20 grasses?</p> <p>21 A Not specifically, no.</p> <p>22 Q Did you have any kind of allergy protocol</p> <p>23 you used inside your home?</p> <p>24 A We just vacuumed constantly, changed</p> <p>25 filters, kept animals out of bedrooms, kept animals</p>

26 (Pages 385 - 388)

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Page 509		Page 511	
1	JURAT	1	ERRATA SHEET
2	MICHAEL J. DANIELS VS AETC II PRIVATIZED HOUSING	2	MICHAEL J. DANIELS VS AETC II PRIVATIZED HOUSING
3	DAY 2 OF 2	3	DEPOSITION OF KASSANDRA WOLF
4	JOB FILE NO. 152322	4	DAY 2 OF 2
5		5	REPORTED BY: MARY K. BECKHAM, CSR RPR
6	I, KASSANDRA WOLF, do hereby state under	6	DATE DEPOSITION TAKEN: AUGUST 25, 2021
7	oath that I have read the above and foregoing	7	JOB FILE NO. 152322
8	deposition in its entirety and that the same is a	8	PAGE LINE IS SHOULD BE
9	full, true and correct transcription of my testimony	9	_____
10	so given at said time and place, except for the	10	_____
11	corrections noted.	11	_____
12		12	_____
13		13	_____
14	Signature of Witness	14	_____
15		15	_____
16	Subscribed and sworn to before me, the	16	_____
17	undersigned Notary Public in and for the State of	17	_____
18	Oklahoma by said witness, KASSANDRA WOLF, on this	18	_____
19	_____ day of _____, 2021.	19	_____
20		20	_____
21	NOTARY PUBLIC	21	_____
22	MY COMMISSION EXPIRES: _____	22	_____
23		23	_____
24		24	_____
25	Job No. CS4750228	25	_____

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1	ERRATA SHEET	1	CERTIFICATE
2	MICHAEL J. DANIELS VS AETC II PRIVATIZED HOUSING	2	
3	DEPOSITION OF KASSANDRA WOLF	3	I, Mary K. Beckham, Certified Shorthand
4	DAY 1 OF 2	4	Reporter, do hereby certify that the above-named KASSANDRA
5	REPORTED BY: MARY K. BECKHAM, CSR RPR	5	WOLF was by me first duly sworn to testify the truth, the
6	DATE DEPOSITION TAKEN: AUGUST 24, 2021	6	whole truth, and nothing but the truth, in the case
7	JOB FILE NO. 152332	7	aforesaid; that the above and foregoing deposition
8	PAGE LINE IS SHOULD BE	8	was by me taken in shorthand and thereafter
9	_____	9	transcribed; that the same was taken, pursuant to
10	_____	10	stipulations hereinbefore set out; and that I am not
11	_____	11	an attorney for nor relative of any of said parties
12	_____	12	or otherwise interested in the event of said action.
13	_____	13	
14	_____	14	IN WITNESS WHEREOF, I have hereunto set my
15	_____	15	hand and official seal this 31st day of August,
16	_____	16	2021.
17	_____	17	
18	_____	18	
19	_____	19	<i>Mary K. Beckham</i>
20	_____	20	Mary K. Beckham, CSR, RPR
21	_____	21	CSR No. 01053
22	_____	22	
23	_____	23	
24	_____	24	
25	_____	25	